

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

Grace New England, et al.,

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Plaintiffs,

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v.

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Docket No. 1:24-cv-00041-PB-AJ

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Weare, NH, Town of, et al.,

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Defendants.

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JOINT MOTION TO STAY

NOW COME the Parties, by and through their respective counsel, to submit this Joint Motion to Stay, and state as follows:

1. On April 10, 2024, the Court held a scheduling conference in this matter. During the conference, the Court directed the Parties to meet and confer for the purpose of discussing a stay of the litigation to allow time for the Parties to explore possible resolution or, in the alternative, set a schedule for proceeding to the consideration of the merits.
2. On April 16, 2024, counsel for the Parties met and conferred, and agreed as follows:
 - a. The case shall be stayed in full for a period of ninety (90) days from the date of the filing of this Joint Motion.
 - b. During the duration of the stay, the Defendants agree not to take any enforcement actions against the Plaintiffs related to religious gatherings at Pastor Kaloogian's Home.
 - c. The stay shall be a complete stay of the case, including the deadline for the Defendants to file a responsive pleading to the Plaintiffs' Complaint.

- d. On or before July 15, 2024, the Parties will notify the Court if the matter has resolved or if further proceedings are needed.
- e. If the case is not resolved prior to the expiration of the stay, the Parties shall either: (a) request an extension of the stay; (b) request a status conference with the Court to set new deadlines for the management of this case; or (c) request such other relief as may be appropriate.

WHEREFORE, the Parties respectfully request that this Honorable Court:

- A. Stay this matter in the manner described above; and
- B. Grant further relief as justice may require.

Respectfully submitted,

**TOWN OF WEARE, NEW HAMPSHIRE
TONY SAWYER
CRAIG FRANCISCO**

By Their Attorneys,

Gallagher, Callahan & Gartrell, P.C.

Dated: April 17, 2024

/s/ Robert J. Dietel
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**GRACE NEW ENGLAND
PASTOR HOWARD KALOOGIAN**

By Their Attorneys:

Dated: April 17, 2024

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CERTIFICATE OF SERVICE

I certify that a copy of this filing was served this date via the Court's electronic filing system upon all counsel of record.

Dated: April 17, 2024

/s/ Robert J. Dietel

Robert J. Dietel